

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

HYUNHUY NAM,

Plaintiff,

v.

PERMANENT MISSION OF THE  
REPUBLIC OF KOREA TO THE UNITED  
NATIONS;

Defendant.

Case No.: 1:21-cv-06165-RA

CIVIL ACTION

**DECLARATION OF JOSHUA S. LIM, ESQ  
IN SUPPORT OF DEFENDANT'S  
MOTION FOR SUMMARY JUDGMENT  
PURSUANT TO FRCP 56**

Joshua S. Lim, Esq., of full age, hereby respectfully makes the following declaration pursuant to 28 U.S.C. § 1746(1):

1. The undersigned is a partner at the law offices of Kim, Cho & Lim, LLC, attorneys for defendant Permanent Mission of the Republic of Korea to the United Nations ("Mission" or "Defendant").
2. As such, the declarant is familiar with the facts stated herein.
3. Annexed hereto as Exhibit 1 is a true and correct copy of the complaint filed on July 19, 2021, as ECF Dkt. # 1.
4. Annexed hereto as Exhibit 2 is a true and correct copy of the transcript of the deposition of Plaintiff, taken on February 22, 2022.
5. Annexed hereto as Exhibit 3 is a true and correct copy of the transcript of the deposition of the Counsellor at the Mission, taken on April 4, 2022.
6. Annexed hereto as Exhibit 4 is a true and correct copy of the 2016 pledge agreement produced by Defendant in this matter as ROKPM0014.

7. Annexed hereto as Exhibit 5 is a true and correct copy of a certified translation of Exhibit 4, produced by Defendant in this matter as ROKPM0014-T, along with the certification of translation.

8. Annexed hereto as Exhibit 6 is a true and correct copy of the 2017 pledge agreement produced by Defendant in this matter as ROKPM0019.

9. Annexed hereto as Exhibit 7 is a true and correct copy of a certified translation of Exhibit 6, produced by Defendant in this matter as ROKPM0019-T, along with the certification of translation.

10. Annexed hereto as Exhibit 8 is a true and correct copy of the 2018 pledge agreement produced by Defendant in this matter as ROKPM0024.

11. Annexed hereto as Exhibit 9 is a true and correct copy of a certified translation of Exhibit 8, produced by Defendant in this matter as ROKPM0024-T, along with the certification of translation.

12. Annexed hereto as Exhibit 10 is a true and correct copy of the 2019 pledge agreement produced by Defendant in this matter as ROKPM0030.

13. Annexed hereto as Exhibit 11 is a true and correct copy of a certified translation of Exhibit 10, produced by Defendant in this matter as ROKPM0030-T, along with the certification of translation.

14. Annexed hereto as Exhibit 12 is a true and correct copy of the 2020 pledge agreement produced by Defendant in this matter as ROKPM0041.

15. Annexed hereto as Exhibit 13 is a true and correct copy of a certified translation of Exhibit 12, produced by Defendant in this matter as ROKPM0041-T, along with the certification of translation.

16. Annexed hereto as Exhibit 14 is a true and correct copy of the 2021 pledge agreement produced by Defendant in this matter as ROKPM0047.

17. Annexed hereto as Exhibit 15 is a true and correct copy of a certified translation of Exhibit 14, produced by Defendant in this matter as ROKPM0047-T, along with the certification of translation.

18. Annexed hereto as Exhibit 17 is a true and correct copy of the 2016 employment contract produced by Defendant in this matter as ROKPM0010 through 0013.

19. Annexed hereto as Exhibit 18 is a true and correct copy of a certified translation of Exhibit 17, produced by Defendant in this matter as ROKPM0010-T through 0013-T, along with the certification of translation.

20. Annexed hereto as Exhibit 19 is a true and correct copy of the 2017 employment contract produced by Defendant in this matter as ROKPM0015 through 0018.

21. Annexed hereto as Exhibit 20 is a true and correct copy of a certified translation of Exhibit 19, produced by Defendant in this matter as ROKPM0015-T through 0018-T, along with the certification of translation.

22. Annexed hereto as Exhibit 21 is a true and correct copy of the 2018 employment contract produced by Defendant in this matter as ROKPM0020 through 0023.

23. Annexed hereto as Exhibit 22 is a true and correct copy of a certified translation of Exhibit 21, produced by Defendant in this matter as ROKPM0020-T through 0023-T, along with the certification of translation.

24. Annexed hereto as Exhibit 23 is a true and correct copy of the a first 2019 employment contract produced by Defendant in this matter as ROKPM0025 through 0029.

25. Annexed hereto as Exhibit 24 is a true and correct copy of a certified translation of Exhibit 23, produced by Defendant in this matter as ROKPM0024-T through 0029-T, along with the certification of translation.

26. Annexed hereto as Exhibit 25 is a true and correct copy of the a second 2019 employment contract produced by Defendant in this matter as ROKPM0031 through 0035.

27. Annexed hereto as Exhibit 26 is a true and correct copy of a certified translation of Exhibit 25, produced by Defendant in this matter as ROKPM0031-T through 0035-T, along with the certification of translation.

28. Annexed hereto as Exhibit 27 is a true and correct copy of the 2020 employment contract produced by Defendant in this matter as ROKPM0036 through 0040.

29. Annexed hereto as Exhibit 28 is a true and correct copy of a certified translation of Exhibit 27, produced by Defendant in this matter as ROKPM0036-T through 0040-T, along with the certification of translation.

30. Annexed hereto as Exhibit 29 is a true and correct copy of the 2021 employment contract produced by Defendant in this matter as ROKPM0042 through 0046.

31. Annexed hereto as Exhibit 30 is a true and correct copy of a certified translation of Exhibit 29, produced by Defendant in this matter as ROKPM0042-T through 0046-T, along with the certification of translation.

32. Annexed hereto as Exhibit 31 is a true and correct copy of the Declaration of the Counsellor at the Mission, dated September 3, 2021, and its internal exhibits A and B

33. Annexed hereto as Exhibit 32 is a true and correct copy of Declaration of the Head of Administration of the Mission, dated August 25, 2021, and its internal exhibit 1.

34. Annexed hereto as Exhibit 33 is a true and correct copy of the transcript of the deposition of the Second Secretary at the Mission, taken on April 4, 2022.

35. Annexed hereto as Exhibit 34 is a true and correct copy of a print-out of a webpage from “naver.com,” the full web address being the following, last accessed on February 16, 2022:

<https://terms.naver.com/entry.naver?docId=5844054&cid=43667&categoryId=43667>

36. Annexed hereto as Exhibit 35 is a true and correct copy of a certified translation of Exhibit 34, along with the certification of translation.

37. Annexed hereto as Exhibit 37 is a true and correct copy of a certified translation of internal exhibit B of Exhibit 31, along with the certificate of translation.

38. Annexed hereto as Exhibit 38 is a true and correct copy of the memorandum opinion and order entered in this action by Hon. Alison J. Nathan, U.S.D.J. on January 21, 2022, filed on ECF as Dkt. # 61.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on July 28, 2022

/s/ Joshua S. Lim  
Joshua S. Lim, Esq.  
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